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September 23, 2009

Patrick Hamblin
Remedial Project Manager
Superfund Division
EPA Region 5
77 W Jackson Blvd | Mail Code: SR-6J
Chicago, IL 60604

RE: No Name Barberton Site 3, aka Midwest Rubber Company – OHD980510598

Mr. Hamblin,

This correspondence serves as Ohio EPA's notice to US EPA that the Midwest Rubber Company site has undergone assessment and remedial actions through Ohio's Voluntary Action Program (VAP). In addition, Ohio EPA received a request for a Covenant Not to Sue (CNS) from the volunteers (MBS Chem Inc. and D.S. OH Limited Partnership) on March 3, 2009. Ohio EPA is reviewing the No Further Action (NFA) letter to ensure the site meets VAP applicable cleanup standards. Once this review is complete and a CNS issued, we will forward a copy for your files.

If you have any further questions, please contact me at (614) 644-3538.

Sincerely,

Tiffani L. Kavalec
Manager – Assessment, Cleanup & Reuse (ACRE)
Division of Emergency & Remedial Response

Enclosure

cc: Rod Beals, NEDO-DERR
Mike Bolas, NEDO-DERR

OhioEPA

State of Ohio
Environmental Protection Agency

Division of Emergency and Remedial Response

Expanded ESI Report
No Name Barberton Site 3 / Midwest Rubber Custom Mixing Corp. Site

Summit County

March 18, 2008

Ted Strickland, Governor
Chris Korleski, Director

EXPANDED SITE INSPECTION (ESI)
REPORT

No Name Barberton Site 3
Barberton and Norton, Summit County, Ohio

U.S. EPA ID: OHD980510598

March 18, 2008

Prepared by: _____ Date: _____
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Reviewed by: _____ Date: _____
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Approved by: David M. Brauner Date: 9/28/09
~~Erica Islas~~ DAVID BRAUNER
Early Action Project Manager
USEPA Region 5

EXPANDED SITE INVESTIGATION
(ESI) REPORT

For

No Name Barberton Site 3
Barberton and Norton, Summit County, Ohio
U.S. EPA ID: OHD980510598

OHIO ENVIRONMENTAL PROTECTION AGENCY
Division of Emergency & Remedial Response
Lazarus Government Center
50 West Town Street, Suite 700
Columbus, Ohio 43215

March 18, 2008

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1.0 EXECUTIVE SUMMARY

The Ohio Environmental Protection Agency (Ohio EPA) Division of Emergency and Remedial Response (DERR) entered into a cooperative agreement with the United States Environmental protection Agency (U.S. EPA) Region V to conduct a Supplemental Expanded Site Inspection (ESI) at the No Name Barberton Site 3 also known as Midwest Rubber Custom Mixing Corporation. The site is located in Summit County, Barberton, Ohio. The purpose of this report is to present the analytical data collected and determine if an ongoing release is occurring at the site.

The work plan for this Supplemental ESI was approved by U.S. EPA in May, 2002. Installation of monitoring wells and sampling of ground water was conducted later that month. The samples were analyzed through the U.S EPA Contract Laboratory Program (CLP) for the Target Compound List (TCL) organics, which included volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), pesticides, and polychlorinated biphenyls (PCBs); and the Target Analyte List (TAL) metals and cyanide.

The investigation identified that there is an ongoing release of contaminants entering groundwater and potentially to surface water. As a result of this release and the potential impact to public health and the environment, the Director of Ohio EPA issued an invitation to negotiate Final Findings and Orders on December 29, 2006 to the property owner for a Remedial Investigation and Feasibility Study (RI/FS) for the site. Subsequent to that invitation, the property owner submitted a Sufficient Evidence determination package to Ohio EPA for purposes of illustrating that they were currently participating in the Voluntary Action Program (VAP). The Ohio EPA evaluated the submittal and concurred that the PRPs met the VAP sufficient evidence provisions. On June 15, 2007, the Director of Ohio EPA issued a Determination of Sufficient Evidence Order to the former Midwest Rubber Site property owners pursuant to the requirements specified in Ohio Administrative Code (OAC) 3745-300-02(D).

2.0 SITE BACKGROUND

2.1 Site Description

The No Name Barberton Site 3 aka Midwest Rubber, (Site) is a 91 acre site owned by Davis Street OH LTD. Partnership. The Site is located between residential and commercial properties in Barberton, Summit County, Ohio, see Figure 1 - Site Location, USGS Topographic Map. Norton Avenue borders the Site to the south and to the west are commercial and residential properties that are accessed by Clarks Mill Road. To the south is a tank truck washing facility owned by Chem-Leaman Corporation. To the north the property consists of woods and old abandoned gravel pits that hold water. The area to the east is bordered by Wolf Creek, wooded land, and the Barberton Akron Railroad property. A chain link fence surrounds most of the manufacturing facility; however the majority of property exists outside the fence line. A gravel parking lot extends about 450 feet north of the main plant and a paved parking area is located east of the main building, see (Figure 2 - Site Features Map).

2.2 Site History

Over the past 75 years, the No Name Barberton Site 3 operated as a rubber manufacturing industry which generated wastes of contact, non-contact cooling waters and solid waste as a part of normal manufacturing operation. Today those industrial wastes have the potential to create a risk to human health and environmental.

The No Name Barberton Site 3 operated in two distinct manners over the years to develop rubber based products. First was the rubber reclaiming operation and second was the mixing of raw rubber with various additives to create a raw product for other rubber fabricating facilities. The rubber reclaiming operation owned and operated by GIT Corp under the Midwest Rubber Reclaiming name operated from 1928 to 1973. The operation consisted of grinding up of old tires and adding naphtha, zinc, and special oils to the mixture in order to soften the rubber. This mixture was dried and resulted in a raw product for distribution.

Contact cooling wastewater containing zinc, oils, greases, and chlorides was generated from this process and discharged to an unlined lagoon located to the west behind the main building. In addition bag house dust from the grind operation was also mixed in slurry and pumped to the settling lagoon. The lagoon was constructed with no surface water discharge point and received about 60,000 gallons of wastewater per day during operation of the facility (Ohio EPA, 1973). During the ESI Ohio EPA identified various other wooden and rubber materials had been dumped into the settling treatment lagoon (Ohio EPA, 1999).

In 1973, the reclamation process ceased operation and was replaced by a custom raw rubber mixing process. Materials used for the custom mixing process involved combining carbon black, oils, raw rubber, and synthetic polymers to produce an

uncured rubber. In order to cure the rubber, zinc oxide and sulfur were used as accelerators. Cooling waters were used to control the curing reaction and these cooling waters were discharged to an earthen-lined lagoon located north of the plant which ultimately discharged into Wolf Creek under a non major NPDES permit (OH0006319). Over the years of operation, the facility had violations of the NPDES permit for exceedances of oil and grease and calcium chloride limits. In the mid 1980s the lagoon was excavated and lined with concrete to form a settling basin with an oil skimmer.

Recent Site Ownership and Litigation Summary

- 1986, MBS Chem. Inc. acquired the property
- 1987, Davis Street Partnership (D S OH Limited) purchased the property and sold the operation portion to the Midwest Custom Mixing Corp.
- In the 1990s, Midwest Custom Mixing, operation only, was acquired by Rubatex, a subsidiary of RBX.
- In December 6, 2000, RBX filed re-organization, Chapter 11 in the Third District US Court, Roanoke VA.
- Midwest Rubber ceased operations in January 2002 and notified Ohio EPA under Cessation of Regulated Operations (CRO)
- Ohio EPA submitted a claim for $8,100,000 against RBX. A settlement for $550,000 to help pay for remediation activities for the site was reached between RBX and Ohio EPA during the hearing in the Third US District Court in Roanoke Virginia.
- February 24, 2004, RBX reorganized through chapter 11 by filing a (voluntary petitions for relief). Ohio EPA submitted an environmental claim against RBX in United States Bankruptcy Court, Western District of Virginia, Roanoke Division. and the Ohio EPA during the hearing in the Third US District Court in Roanoke Virginia. Ohio EPA received a partial payment of $200,000 before RBX filed for Second Amended Chapter 11 Plan of Liquidation, June 6, 2005. On behalf of the State of Ohio, Ohio EPA filed a general unsecured claim for the remaining amount, February 22, 2007.
- DS OH Limited maintained property ownership throughout.

Site Clean Up Schedule

On December 26, 2006, Ohio EPA sent an enforcement letter to the former Midwest Rubber site owner requesting the owner, DS OH Limited, to negotiate a Remedial Investigation/Feasibility Study (RI/FS) Order. DS OH Limited responded to Ohio EPA's RI/FS Order by submitting a sufficient evidence demonstration through Ohio's Voluntary Action Program (VAP) under section OAC 3745-300-02(D) of the Ohio Administrative Code (OAC). Ohio EPA reviewed the submittal and concurred that the sufficient evidence demonstration was acceptable and complete. On June 5, 2007, the Ohio EPA Director issued Final Findings and Orders (FF&Os) to the owners the requirements for proceeding expeditiously through the clean-up process to fulfill the Sufficient Evidence demonstration.

2.3 Previous Site Work

In March of 1973, Ohio EPA conducted a ground water evaluation at the site to determine if wastewater lagoons were impacting the ground water. Samples were collected from the three on-property water supply wells. The range of depth of these wells is between 102 and 111 feet below grade. Analysis of the ground water was performed for oil and grease, metals and water quality parameters and the results identified no impact on the deep aquifer, Ohio EPA 1973. These three wells represented the deeper aquifer and although contaminants were not identified, there was a concern that the shallow aquifer may be contaminated because no shallow ground water samples were collect during the 1973 investigation. See Figure 2 for monitoring well locations.

On December 4, 1980, Ecology and Environment Inc. (E&E), Field Investigation Team (FIT) a contractor for U.S. EPA conducted an off-site reconnaissance in response to anonymous telephone caller complaints alleging an oily sheen in Wolf Creek. FIT noted that cooling water was being discharged into Wolf Creek from the Midwest facility at a location approximately 800 feet north of the intersection of Norton Avenue and Wolf Creek. In addition, an oily sheen was observed in Wolf Creek and was attributed to the wastewater discharge.

On May 16, 1985, Ohio EPA's Division of Solid and Hazardous Waste Management (DSHWM) completed a Preliminary Assessment (PA) for the site. At the time of the PA there was little information available concerning waste management issues. As a result, the site was given a low priority for future U.S. EPA's Field Inspection Team (FIT) activities and a medium priority for action by the state.

In 1989, U.S. EPA contracted with Ecology and Environment Inc. (E&E) to conduct a Screening Site Investigation (SSI). This investigation was conducted between September and October of 1989. Analysis of on-site soil and sediment samples revealed semi-volatile organic compounds (SVOCs) and metals at concentrations above the normal background levels. Ground water from an on-site residential well sample RW4 revealed several significant concentrations of both TAL compounds and

TAL analytes, including benzoic acid (3.0 J ug/L), phenol (1.0 J ug/L) and manganese (338 ug/L). The SSI identified that the potential existed for release of contamination from the site to enter waters of the state, specifically Wolf Creek. E&E also concluded that the potential exposure existed for off-site receptor population. This was primarily because the Barberton municipal water supply source was within 2 miles of the site and used a combination of ground water and surface water as their drinking water supply.

On March 30, 1994, Ohio EPA Division of Hazardous Waste Management (DHWM) conducted a site inspection in response to a complaint alleging that hazardous waste was being buried at the facility. Although no evidence of hazardous waste burial was found, the inspector identified pits on the east side of the facility were being used to mix residual oil and rubber fines from the manufacturing process with sand and gravel. This material was then being used as a topping for the parking lot and driveway. The inspector identified this type of application was considered to be a potential violation of solid waste regulations. The Ohio EPA inspector requested that these areas be cleaned up.

On May 11, 1995, PRC Environmental Management Inc. (PRC), a contractor of U.S. EPA, conducted a focused site inspection prioritization site evaluation to determine if the Midwest facility was a potential National Priorities List (NPL) candidate. A site reconnaissance was conducted to gather additional information. No additional sampling was performed as part of the investigation. PRC used historical information along with interviews and determined that surface water was a primary pathway of concern. A report was prepared for U.S. EPA on July 28, 1995.

Ohio EPA performed and completed an Expanded Site Inspection and Site Team Evaluation Prioritization (STEP) report on September 15, 1999. The report concluded that contaminants were present in shallow ground water around the waste disposal areas to the west but because of questionable data Ohio EPA could not quantify the levels of contamination. The report also identified soil and sediment contamination in the historical unlined wastewater treatment lagoon area. The contaminants identified through sampling and analysis was various VOCs, SVOCs, metals, and PCB Aroclor 1248. Some metals (copper, beryllium, vanadium, zinc, arsenic cadmium and chromium) were detected in excess of background samples. Because there were no ground water samples below 14 feet, the STEP recommended additional assessment of the ground water

2.3 Site Geology & Hydrology

Summit County is located on the glaciated Appalachian Plateau and consists primarily of glacial deposits of till, kames and kame terraces, and outwash overlying Pennsylvanian and Mississippian aged bedrock. A study of the bedrock topography reveals three sinuous buried valleys trending roughly north-south across the county. The buried valleys contain deposits of clayey till, sand, and gravel with a depth of thickness up to 400 feet.

The No Name Barberton Site 3 is located on the west bank of Wolf Creek, overlying a buried valley. Cross sections constructed by Smith and White (1953) reveals that the stratigraphy of the buried valley in the vicinity of this site consists of clay or till overlying sand and gravel that is underlain by a sand containing some coarser stringers. White (1982), later identified these buried valley sediments as glacial outwash and kame deposits. Although no site specific data is available through wells or test borings, Smith and White (1953) have estimated that the depth to bedrock in the vicinity of the site is between 125 and 150 feet.

The sand and gravel rich buried valleys, located in the southern and central parts of Summit County, may yield from 5 gallons per minute (gpm) to over 1000 gpm, with typical yields in the range from 10 gpm to 65 gpm. The site is located in an area in which well yields of 5 to 20 gpm are readily available at depths of less than 65 feet (Schmidt, 1994). With extensive test drilling to locate coarse material, industrial wells producing more than 500 gpm can be developed (Schmidt, 1994).

Shallow ground water flow is believed to be in a southeasterly direction toward Wolf Creek, unfortunately with only three monitoring wells installed and two in fill it is not possible to accurately triangulate flow direction. Because of the historical excavated area only a general flow direction could be defined, east by southeast.

3.0 SAMPLING LOCATIONS & DISCUSSION OF RESULTS

3.1 Monitoring Well Samples

In May 2002, three ground water monitoring wells were installed and sampled around the settling treatment lagoon to determine if ground water had been impacted. Two wells (MW-2 and MW-3) were installed in an approximate down-gradient location and one well (MW-1) in an approximate up-gradient location; see Figure 3- Monitoring Well Sampling Locations.

The purpose of the three wells was to locate and sample the uppermost water bearing zone below the approximate 14 foot depth of the lagoon. During the drilling of MW-1, fill material was encountered until about 12 feet consisting of sand, gravel, rubber, and wood debris. Between 12 feet and 15 feet, waste material was encountered which was consistent with the type of waste found in the lagoon. MW-1 was completed to a depth of 20 feet and a five foot screen was installed at the bottom of the well.

MW-2 was placed to the south of the lagoon. MW-2 was installed at an elevation difference of approximate six feet higher in elevation compared to MW-1. Drilling revealed mostly fill of demolition debris, brick, wood, and metal down to about 18 feet. MW-2 was complete at 23 feet and a five foot screen was installed at the bottom of the well.

MW-3 was placed to the east side of the treatment lagoon, down gradient in a wooded

area. MW-3 was completed to 27 feet and a five foot screen was installed at the bottom of the well. Observed native soils were encountered to ground water. (IT Report Midwest Rubber 2003).

Samples were collected May 14, 2002 and shipped using appropriate U.S. EPA Contract Laboratory Procurement (CLP) protocol. The summary of results can be seen in Table 1 below. The monitoring well sampling and analysis indicate that ground water was contaminated with VOCs (Vinyl Chloride, BTEX, Naphthalene TCE, 12 DCE, PCE, Styrene, 1,2 DCA) and SVOCs (Phenol, 2-Methylphenol, 4-Methylphenol, 2,4 Dimethylphenol, Caprolactam and N-Nitrosodiphenylamine). Compounds that exceeded the drinking water maximum contaminant level (MCL) are: Benzene (230 ug/l), Vinyl Chloride (3 ug/l), 1,2- Dichloroethane (150 ug/l), Trichloroethene (40 ug/l) and Tetrachloroethene (45 ug/l). Although MW-1 was intended to be an up-gradient well, waste was encountered during its installation. The extent of waste therefore extended farther west towards the cut wall than expected. A review of old USGS topographic maps of this area, specifically the 1964 Akron West Ohio 15' quadrangle, showed a depressed area in the location of the treatment lagoon area on Midwest Rubber property. When compared to the 2001 Summit County Engineering Topography maps, a 12 to 16 foot difference can be observed in the elevations from the USGS 1967 map. Subsequent work by the property owner's consultant completed a geophysical survey on the treatment lagoon and indentified fill depths approaching 20 feet, Arcadis 2005. The potential exists that waste is throughout the historical gravel pit area, Figure 4.

The compounds found in the monitoring wells MW-1 and MW-2 are similar to the compounds detected in the samples of the settling treatment lagoon, (ESI/STEP Report, Ohio EPA 1999). It was identified in MW-2 that fill extends south towards Norton Avenue on the west side of the tank cleaning operation and as far north as the current water treatment lagoon, MW-1. Complete analytical results of this investigation are contained in Appendix A. Significant findings based on these data are summarized in Table 1. The analytical data was reviewed by U.S. EPA Region 5 personnel for compliance with the CLP, and validated by the Region 5 Central Regional Laboratory staff.

A photographic log of sampling locations can be found in Appendix B. Standard Quality Assurance and Quality Control (QA/QC) procedures for Supplemental ESI field activities were followed during the investigation. These procedures, including sample collection, packaging and shipping, and equipment decontamination, are documented in the Quality Assurance Project Plan (QAPP) for Region 5 Superfund Site Inspection Activities for Ohio EPA and in Ohio EPA Field Standard Operating Procedures (FSOPs).

4.0 MIGRATION PATHWAYS

4.1 Soil Exposure Pathway

The on-site manufacturing buildings are surrounded by a fence. The eastern portion of the site slopes in an easterly direction toward Wolf Creek, potentially allowing for contaminants to run-off toward the creek. The eastern portion is sparsely vegetated area and may restrict surface water flow. On the far western portion of the site, where the waste lagoon area is located, the site slopes toward the northeast. Access is available from the road to the south and side properties to the west as well as access from the north. There is evidence of trespassing activities around the waste lagoon area. Empty bottles and the remains of bonfires were observed during the sampling event. This activity was also identified during the STEP work, STEP 1999. Possible exposure from direct contact with soil contaminants could occur during any trespassing event along with inhalation exposure of burning of the exposed waste.

There are no schools, or daycares, within 200 feet of any zone of contamination though residential houses and the closest resident are approximately 675 feet from the landfill disposal area. The population within one mile is 5833 people. Census information can be found in *Appendix D*.

4.2 Groundwater Pathway

Municipal water supply is obtained from both ground water and surface water sources which are located approximately 1.5 miles north and upstream from the Site. The City of Barberton Municipal Water system uses the Barberton Reservoir in conjunction with ground water wells to supply its approximately 29,000 people with public drinking water. The municipal water system supplies water to businesses and residents within the City limits of Barberton as well as part of Norton and Coventry townships (COB, 1993). Three standby municipal ground water wells are located in a well field along Pigeon Creek near the creek's confluence with Wolf Creek. The three municipal wells range in depth from approximately 101 to 133 feet below ground surface (bgs) and are completed in unconsolidated sand, gravel, and clay outwash. These wells are periodically used to supply water to the Barberton Reservoir when the water level in the reservoir is low. The wells can also be pumped into the head of the water treatment plant along with the reservoir water. Wells 1 and 2 each have a production rate of 1,000 gpm, while the production rate for Well 3 is 1,500 gpm.

Midwest Rubber uses municipal water for its potable water supply. The facility also has an on-site production wells that are used to fill a buried concrete cistern with water for use in production cooling waters and fire suppression.

Abandoned water well was discovered at a small motel, Shamrock Motel, located at 635 Norton Ave, approximately 1000 feet east of the facility. Currently the motel uses municipal water supplied by the City of Barberton.

The nearest private domestic wells are located within 0.25 miles of the site along Clark Mill Road. Approximately 15,574 residents within 4 miles of the site obtain their water from private wells (Frost 1995). All of the private residential wells identified are believed to be up gradient of the site.

4.3 Surface Water Pathway

The surface water pathway target was identified in the STEP/ESI Report (1999) which indicated contaminants from the site have impact waters of the state. A potential does exist for the release of TCL compounds or TAL analytes to be discharged to Wolf Creek via the NPDES permitted outfall and/or the storm water lagoon that discharges into Wolf Creek as well as over-land surface water flows. Wolf Creek flows in a southeasterly direction for 2.75 miles where it enters the Tuscarawas River. The Tuscarawas River continues flowing in a southeasterly direction from Wolf Creek. The target distance limit (TDL) is defined as that area between the entry point of contaminant runoff water entering the creek and fifteen (15) miles downstream. Drinking water threat targets are contaminants entering Wolf Creek and surface water and potential water intakes that supply drinking water. Currently there are no water intakes downstream from the site.

Currently, there is a fishing ban in effect for the Tuscarawas River issued by the Ohio EPA , Ohio EPA Fish Advisory 2006, from Arlington Road in Summit County south through Barberton, Ohio. Even with the ban, both Wolf Creek and the Tuscarawas River are currently used for fishing purposes. During both the site reconnaissance and the sampling event in September and October of 1997 respectively, people were observed fishing in Wolf Creek by representatives of the Ohio EPA.

Both the Tuscarawas River and Wolf Creek run adjacent to wetland areas (sensitive environments) between the PPE and the TDL. These wetland areas, including water bodies containing fish, are considered potential targets.

All sensitive environments near the site are considered either state endangered or state threatened. The closest state endangered plant is the Shore-Growing Peat Moss and Bog Willow which is located 1.05 miles from the site, and the Rose Twisted Stalk, which is located 0.4 miles from the site. See GIS information in *Appendix D* for a complete list of sensitive environments.

4.4 Air Pathway

Although Ohio EPA personnel did not initiate a formal air sampling program at the No Name Barberton Site 3. Portable air monitoring was conducted during the sampling investigation.

The estimated population is as follows:

Radius	Population
0 - 1/4	271
1/4 - ½	1403
½ - 1	5833
1-2	18513
2-3	19106
3-4	25668
Total	10802

5.0 Conclusion

Using the combined data of the ESI/STEP Report (ESI/STEP Report, Ohio EPA 1999) and the new data collected from this Supplemental ESI, releases of contaminants have occurred from the facility to soils, ground water and surface water.

The operations at the No Name Barberton Site 3 have ongoing releases that potentially could impact human health and the environment. The most immediate threat is to unrestricted public access to contaminated soils through direct contact. Evidence of such exposure activity to the elevated levels of metals, SVOCs including PCBs was found in the area of the historical waste water treatment lagoons.

The results of the monitoring well sampling and analysis indicate that ground water is impacted by (VOCs) at the shallow level but has not reached the depth of the production wells. Monitoring wells MW-1, MW-2 and MW-3 have contaminants in excess of drinking water MCLs. This indicates that contaminants from the treatment lagoons have migrated into the ground water and is impacting the shallow ground water aquifer.

The facility currently uses the Barberton municipal water supply for its potable and occupancy purposes. According to Mike Zwick, maintenance operator, the on-site production wells are used to fill a buried concrete cistern with water for use for cooling water during production and for fire suppression. The production wells were sampled

and the water analyzed. Although no contamination was detected in these wells related to the manufacturing process, future uses of onsite ground water wells could cause the shallow contaminants to migrate downward towards the deeper aquifer.

The City of Barberton's drinking water intakes are within the 4 mile target distance limit. Although the intakes are within the 4 mile radius from the site, they are up-gradient from the Site. The ground water wells would be the only possibility for drawing contaminated water towards these intakes and because the distance from the site that probability would be very low.

The STEP/ESI identified sediment and surface water contamination in Wolf Creek. This could have been the result of contaminated storm water runoff from the site and historical unauthorized discharges of contaminants from the NPDES permitted outfall. This contamination could potentially impact fisheries and sensitive environments.

As of June 1, 2007, the current property owner was issued a Sufficient Evidence Demonstration Order by the Director of Ohio EPA. The current owners have demonstrated that they are expeditiously participating in Ohio EPA's Voluntary Action Program (VAP). It is the current property owner's responsibility to demonstrate continued progress in this voluntary clean-up program by following an expeditious schedule for the remediation of the property. Ohio EPA will monitor that progress through the schedule identified in the Sufficient Evidence Demonstration Order.

Table 1. Monitoring Well -Significant Results Report, May 14, 2002 sampling event.

Sampling Location :	NN-MW-01		NN-MW-02		NN-MW-03	
Matrix :	Water		Water		Water	
Units :	**ug/L**		**ug/L**		**ug/L**	
Date Sampled :	05/14/2002		05/14/2002		05/14/2002	
Volatile Compound	Result	Flag	Result	Flag	Result	Fla
Vinyl Chloride	**3**	J	10	U	10	U
	0.9	J	10	U	10	U
Acetone	**21**	J	**50**	J	10	UJ
Carbon Disulfide	**2**	J	10	U	0.7	J
Methyl Acetate	10	U	**3**	J	10	U
Methylene Chloride	**50**		10	U	10	U
2-Butanone	**6**	J	**14**		10	U
Chloroform	**13**		10	U	10	U
1,1,1-Trichloroethane	**1**	J	10	U	10	U
Benzene	**230**	J	**25**		10	U
1,2-Dichloroethane	**150**		10	U	10	U
Trichloroethene	**40**	J	10	U	**4**	J
4-Methyl-2-pentanone	**21**		**4**	J	10	U
Toluene	**180**	J	**96**		**1**	J
Tetrachloroethene	**45**		10	U	**5**	J
Chlorobenzene	**4**	J	**2**	J	10	U
Ethylbenzene	**290**		**48**		10	U
Xylenes (total)	**270**		**150**		0.7	J
Styrene	**150**		**9**	J	10	U
Phenol	**140**		250	U	10	U
1,2-Dichlorobenzene	**16**		10	U	10	U
4-Methylphenol	**180**		**210**	J	10	U
2-Methylphenol	**77**		**48**	J	10	U
2,4-Dimethylphenol	**92**		**99**	J	10	U
Naphthalene	**400**	J	**35**	J	10	U
Caprolactam	**120**	J	**1100**		**2**	J
1,1-Dichloroethene	**0.5**	J	10	U	10	U
2-Methylnaphthalene	**6**	J	250	U	10	U
Isopropylbenzene	**3**	J	**3**	J	10	U
N-	**60**	J	250	U	10	U
bis(2-	50	UJ	250	U	**0.6**	J
cis-1,2-Dichloroethene	**9**	J	10	U	**0.5**	J
Endrin ketone	0.10	UJ	**0.021**	**J**	0.10	UJ
2-Hexanone	10	U	**3**	J	10	U